

4 November 2009

MEMO TO: Commissioner Julius Genachowski and the Federal Communications Commission

FROM: Lauren-Glenn Davitian, Executive Director, CCTV Center for Media & Democracy, Burlington VT, davitian@cctv.org, 802.862.1645 x12

RE: Comments -- NBP Public Notice #7 - GN Docket Nos. 09-47, 09-51, 09-137

Thank you for the opportunity to comment on the National Broadband Plan (namely GN Docket Nos. 09-47, 09-51, 09-137). CCTV Center for Media and Democracy works to advance free speech, public access and open networks in and around Burlington Vermont. We operate a government access cable TV channel (Channel 17/ Town Meeting Television) that serves 30,000 cable subscribers throughout Chittenden County Vermont (home to 25% of the state's population). Channel 17 is part of a vital and robust network of 25 community media centers that operate more than 40 public, educational and government access channels in a state of 621,270. The purpose of our comments is to provide input on the effective role of government in local broadband deployment.

The principal way that that local government can (and does) advance broadband adoptions is through municipal ownership of local telecommunications systems.

A municipally owned cable system was first proposed for the City of Burlington Vermont in the mid-1980's when it became clear that Cox Cable would deliver better and cheaper service only if competition was available to cable subscribers. Since then, fifty Vermont cable companies have merged into six and the national cable industry has merged into "triple play provider" of voice, data and video systems.

In Vermont, Comcast serves more than 85% of the state's population. Cable prices have increased at rates in excess of any other consumer services and local offerings are determined by business people far from the local level. Comcast's broadband services business model follows this pattern. Comcast, like many providers in search of low cost customers, chooses not to serve all of the homes and businesses within their service territories, leaving the business to the satellite and telecom providers (and then complaining that the competition is untenable for them).

Fairpoint, the dominant telecom provider in the Vermont, is saddled with enormous debt, an antiquated network and unreliable service, thanks to Verizon taking more than \$1.5 billion in equity

out of the state at the time of its sale in 2008.

In Burlington, Vermont, the community voted in large numbers (in two ballot items) to support the construction of Burlington Telecom, a state of the art, fiber-to-the-home, triple play system that now serves many parts of the city and is poised to expand to neighboring communities. The impact of this vital community resource in the delivery of meaningful broadband speeds has been immediate. The standard service offering is 10 megabytes and the system is capable of 100 megabyte speeds. Burlington Telecom promotes economic development, affordable access, bandwidth and data speeds that will move us into the future, and civic engagement. Based on the Burlington Vermont example, here are six reasons why the FCC and Congress should actively support the development of municipal broadband systems throughout the United States.

1. BT's capacity and speed attracts "digital economy" businesses that pay well and serve our community in many ways.
2. City departments pay less for fast, reliable digital networks than they'd pay to private sector companies.
3. Competition with Comcast and Fairpoint's phone, internet and cable services brings prices down for everyone—plus the customer service is local!
4. BT pays more in taxes and payment in lieu of taxes than the private sector telecom companies.
5. Locally owned means that the "profits" go back into the network and keep rate-payers costs and prices lower for the long term.
6. BT provides additional access channels for live meeting coverage and public information (including Channel 17 and now, live Channel 317). (See www.channel17.org

Our long term access to affordable and robust voice, data and video services depends on the success of Burlington Telecom and other public projects like it. And, as our one hundred year investment in Burlington Electric, our municipal power company, now demonstrates, Burlington Telecom can secure our telecommunications future and serve as a vital resource for our future competitiveness and sustainability.

Thank you for considering these comments. Feel free to contact me at davitian@cctv.org or 802.862.1645 x12.